

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

In re:

MINING PROJECT WIND DOWN HOLDINGS,  
INC. (f/k/a Compute North Holdings, Inc.), *et al.*,

Debtors.<sup>1</sup>

Chapter 11

Case No. 22-90273 (MI)

(Jointly Administered)

**JOINT MOTION OF PLAN ADMINISTRATOR,  
RK MISSION CRITICAL LLC, AND LP1 LLC TO  
ADJOURN HEARING ON STIPULATION AND AGREED ORDER**

**THIS MOTION SEEKS AN ORDER THAT MAY ADVERSELY AFFECT YOU. IF YOU OPPOSE THE MOTION, YOU SHOULD IMMEDIATELY CONTACT THE MOVING PARTY TO RESOLVE THE DISPUTE. IF YOU AND THE MOVING PARTY CANNOT AGREE, YOU MUST FILE A RESPONSE AND SEND A COPY TO THE MOVING PARTY. YOU MUST FILE AND SERVE YOUR RESPONSE WITHIN 21 DAYS OF THE DATE THIS WAS SERVED ON YOU. YOUR RESPONSE MUST STATE WHY THE MOTION SHOULD NOT BE GRANTED. IF YOU DO NOT FILE A TIMELY RESPONSE, THE RELIEF MAY BE GRANTED WITHOUT FURTHER NOTICE TO YOU. IF YOU OPPOSE THE MOTION AND HAVE NOT REACHED AN AGREEMENT, YOU MUST ATTEND THE HEARING. UNLESS THE PARTIES AGREE OTHERWISE, THE COURT MAY CONSIDER EVIDENCE AT THE HEARING AND MAY DECIDE THE MOTION AT THE HEARING.**

**REPRESENTED PARTIES SHOULD ACT THROUGH THEIR ATTORNEY.**

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<sup>1</sup> The Reorganized Debtors in these chapter 11 cases, along with the last four digits of each Reorganized Debtor's federal tax identification number, include: Mining Project Wind Down Holdings, Inc. (f/k/a Compute North Holdings, Inc.) (4534); Mining Project Wind Down LLC (f/k/a Compute North LLC) (7185); Mining Project Wind Down Corpus Christi LLC (f/k/a CN Corpus Christi LLC) (5551); Mining Project Wind Down Atoka LLC (f/k/a CN Atoka LLC) (4384); Mining Project Wind Down BS LLC (f/k/a CN Big Spring LLC) (4397); Mining Project Wind Down Colorado Bend LLC (f/k/a CN Colorado Bend LLC) (4610); Mining Project Wind Down Developments LLC (f/k/a CN Developments LLC) (2570); Mining Project Wind Down Equipment LLC (f/k/a CN Equipment LLC) (6885); Mining Project Wind Down King Mountain LLC (f/k/a CN King Mountain LLC) (7190); Mining Project Wind Down MDN LLC (f/k/a CN Minden LLC) (3722); Mining Project Wind Down Mining LLC (f/k/a CN Mining LLC) (5223); Mining Project Wind Down Pledgor LLC (f/k/a CN Pledgor LLC) (9871); Mining Project Wind Down Member LLC (f/k/a Compute North Member LLC) (8639); Mining Project Wind Down NC08 LLC (f/k/a Compute North NC08 LLC) (8069); Mining Project Wind Down NY09 LLC (f/k/a Compute North NY09 LLC) (5453); Mining Project Wind Down STHDAK LLC (f/k/a Compute North SD, LLC) (1501); Mining Project Wind Down Texas LLC (f/k/a Compute North Texas LLC) (1883); Mining Project Wind Down TX06 LLC (f/k/a Compute North TX06 LLC) (5921); and Mining Project Wind Down TX10 LLC (f/k/a Compute North TX10 LLC) (4238). The Reorganized Debtors' service address for the purposes of these chapter 11 cases is 2305A Elmen Street, Houston, TX 77019.

Tribolet Advisors, LLC, in its capacity as plan administrator (the “Plan Administrator”) of the confirmed *Third Amended Joint Liquidating Chapter 11 Plan of Mining Project Wind Down Holdings, Inc. (f/k/a Compute North Holdings, Inc.) and Its Debtor Affiliates* (the “Plan”)<sup>2</sup>, RK Mission Critical LLC (“RKMC”), and LP1 LLC (“LP1” and, together with the Plan Administrator and RKMC, the “Parties”) hereby file this joint motion (the “Motion”) requesting that the Court adjourn the hearing on the *Stipulation and Agreed Order* (the “Stipulation”)<sup>3</sup> currently scheduled for June 22, at 4:00 p.m. (CT) until July 12, 2023, at 11:30 a.m. (CT). In support of the Motion, the Parties respectfully state as follows:

1. On September 22, 2022, the above-captioned debtors (the “Debtors” and, as of the effective date of the Plan, the “Reorganized Debtors”) filed voluntary petitions commencing these chapter 11 cases.

2. On March 31, 2023, the effective date of the Plan occurred.<sup>4</sup> The Plan provided for the appointment of the Plan Administrator.

3. On May 17, 2023, the Plan Administrator filed the Stipulation, pursuant to which (i) RKMC and LP1 agree to the sharing of certain commissions to which RKMC is entitled in connection with any future sales of those certain sixty-two containers (x) of which the Reorganized Debtors have possession and (y) as to which RKMC asserts a perfected security interest, which the Reorganized Debtors dispute (collectively, the “Remaining Containers”); and (ii) the Plan Administrator acknowledges such sharing of commissions for purposes of proper payment upon any sale of the Remaining Containers.

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<sup>2</sup> ECF No. 889.

<sup>3</sup> ECF No. 1134.

<sup>4</sup> ECF No. 1082.

4. On May 18, 2023, the Court *sua sponte* set the Stipulation for hearing on June 22, 2023 at 4:00 p.m. (CT) (the “Hearing Date”).

5. The Parties are not available to attend a hearing on the Hearing Date. The Parties have, however, conferred with the Court and determined that the Parties and the Court are available for an adjourned hearing on July 12, 2023 at 11:30 a.m. (CT).

WHEREFORE, the Parties jointly request that the Court enter an order, substantially in the form of the proposed order attached hereto as **Exhibit A**, (i) adjourning the hearing on the Stipulation currently scheduled for June 22, 2023, at 4:00 p.m. (CT) to July 12, 2023, at 11:30 a.m. (CT), and (ii) granting such other relief as the Court deems just and proper.

*[Signature Page Follows]*

Dated: May 31, 2023  
Dallas, Texas

**MCDERMOTT WILL & EMERY LLP**

/s/ Charles R. Gibbs

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*Counsel to RK Mission Critical LLC*

**CERTIFICATE OF SERVICE**

I certify that on May 31, 2023, I caused a copy of the foregoing document to be served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas.

/s/ Charles R. Gibbs  
Charles R. Gibbs